



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

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Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

**RE: PERMIT TO INSTALL FINAL CHAPTER 31
MODIFICATION
SHELBY COUNTY
Application No: 05-10137**

CERTIFIED MAIL

| | |
|---|----------------------|
| | TOXIC REVIEW |
| | PSD |
| X | SYNTHETIC MINOR |
| | CEMS |
| | MACT |
| | NSPS |
| | NESHAPS |
| | NETTING |
| | MAJOR NON-ATTAINMENT |
| | MODELING SUBMITTED |

DATE: July 18, 2000

Honda Of America Mfg., Inc.
Jeff McCormack
12500 Meranda Road
Anna, OH 45302

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA
DAPC, SWDO



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install

Issue Date: July 18, 2000

Terms and Conditions

Effective Date: July 18, 2000

FINAL CHAPTER 31 MODIFICATION OF PERMIT TO INSTALL 05-10137

Application Number: 05-10137

APS Premise Number: 0575000174

Permit Fee: **\$5600**

Name of Facility: Honda Of America Mfg., Inc.

Person to Contact: Jeff McCormack

Address: 12500 Meranda Road

Anna, OH 45302

Location of proposed air contaminant source(s) [emissions unit(s)]:

12500 Meranda Road

Anna, OHIO

Description of proposed emissions unit(s):

MODIFICATION TO INCREASE THE OPERATIONAL HOURS OF CERTAIN FERROUS CASTING LINE #2 EMISSION UNITS CONTROLLED WITH FABRIC FILTERS.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with

OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.) See B.14 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upsets.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if

specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

- i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the appropriate Ohio EPA District Office or local air agency in the following manner and with the following content:
- i. Compliance certifications shall be submitted on an annual basis unless the applicable requirement specifies more frequent submissions.
 - ii. Compliance certifications shall include the following:
 - (a) An identification of each term or condition of this permit that is the basis of the certification.
 - (b) The permittee's current compliance status.
 - (c) Whether compliance was continuous or intermittent.
 - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
 - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
 - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

10. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

11. Title V Permit To Operate Application

Pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit.

B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also

furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

8. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute

an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

9. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

10. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

12. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

13. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit To Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

| <u>Pollutant</u> | <u>Tons Per Year</u> |
|------------------|----------------------|
| Particulate | 25.9 |
| PM | 25.9 |
| OC | 24.3 |

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

The particulate emissions from fabric filter BH-50 serving emissions units P018, P056, P058, and P904 shall not exceed 0.010 grain per actual cubic foot of the total exhaust gases.

The particulate emissions from fabric filter BH-60 serving emissions units P018, P056, P057, and P061 shall not exceed 0.010 grain per actual cubic foot of the total exhaust gases.

The particulate emissions from fabric filter BH-260 serving emissions units P905, P076, P908, and P901 shall not exceed 0.010 grain per actual cubic foot of the total exhaust gases.

The permittee reserves the right to direct the particulate emissions from any other existing or new emissions units (once permitted and thereby considered existing) to these fabric filters with the understanding that emissions will not exceed 0.010 grain per actual cubic foot of the total exhaust gases and/or individual emission unit's permitted allowable emission limitation.

This right is allowed as long as the permittee does not trigger the modification definition pursuant to Ohio Administrative Code (OAC) rule 3745-31-01 and submits information to the Ohio EPA within thirty days after the change(s) documenting the change(s). This information would include, but not limited to, the following: a description of which emissions units were redirected to which baghouse, and calculations supporting the permittee's contention that the redirection of existing emissions units would not trigger the modification definition pursuant to Ohio Administrative Code (OAC) rule 3745-31-01.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|--|--------------------------------------|--|
| Casting, Cooling, Degating, and Sorting Line #2 (existing) | OAC Rule 3745-31-05(D) | 7.17 tons PM/yr., as a rolling, 12-month summation from the stack; |
| | OAC rule 3745-17-07(A)(1) | Less stringent than OAC rule 3745-31-05 |
| | OAC rule 3745-17-11(B)(1) | Less stringent than OAC rule 3745-31-05 |
| | OAC rule 3745-31-05(A)(3) | 2.39 lbs. PM/hour from the stack |
| | | 0.010 gr./dscf from the stack |
| | | 0% opacity, as a six minute average, from the stack. |
| | | 0.004 lb. PM/hour from the fugitive dust source. |
| | | 0.12 ton PM/yr, as a rolling, 12-month summation from the fugitive dust source. |
| | | 20% opacity, as a three minute average, from the fugitive dust source |
| | | The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), OAC rule 3745-17-11(B)(1), and OAC rule 3745-31-05(D). |

2. Additional Terms and Conditions

- 2.a** Compliance with OAC rule 3745-31-05 shall be demonstrated by the use of a baghouse(s) and compliance with the limits in term A.I.1.

II. Operational Restrictions

1. The maximum annual operating hours for this emissions unit shall not exceed 6,000 hours per year, based upon a rolling, 12- month summation of the operating hours.

This is an existing source and the applicant has historical data demonstrating compliance with the rolling 12-month summation of operating hours.

2. The pressure drop across the baghouse shall be maintained within the range of 1 to 15 inches of water while any emission unit controlled by the baghouse is in operation except for the first 45 days following a change of at least 50% of the fabric bags, when the pressure drop shall be maintained below 15 inches of water while any emission unit controlled by the baghouse is in operation.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:
- a. The operating hours for each month.
 - b. The rolling , 12-month summation of the operating hours.
2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse(s) while the emissions unit(s) is in operation. The monitoring equipment shall be installed, calibrated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse once each operating day.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month operating hours limitation excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.
2. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the emission unit was in operation and the pressure drop across the baghouse did not comply with the allowable range specified in the permit.
3. These reports, as denoted in terms A.IV.1. and 2., are due by the date described in Part 1- General Terms and Conditions of the permit under section (A) (1).

V. Testing Requirements

1. Compliance with the emission limitation(s) in section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:

7.17 tons of PM per year, as a rolling 12-month summation from the stack.

Applicable Compliance Method:

Compliance with the 7.17 tons of PM per rolling limitation shall be assumed as long as the 6,000 hours per rolling 12-month summation is met. This is based both on the recordkeeping requirements in term A.III. and the following calculation:

$$(\text{MASER})(\text{AOH})(\text{CONV}) = 7.17 \text{ tons of PM per year}$$

where

MASER = the maximum allowable stack emission rate (2.39 lbs PM/hr.)

AOH = the actual operating hours**

CONV = conversion factor (1 ton/2000 lbs.)

** As long as the 12-month hours of operation limitation in term A.II. is met, compliance with this limitation is demonstrated.

- b. Emission Limitation:

0.12 ton of PM per year, as a rolling 12-month summation from the fugitive dust source.

Applicable Compliance Method:

Compliance with the 0.12 ton of PM per rolling limitation shall be assumed as long as the 6,000 hours per rolling 12-month summation is met. This is based both on the recordkeeping requirements in term A.III. and the following calculation:

$$(\text{MAFER})(\text{AOH})(\text{CONV}) = 0.12 \text{ ton of PM per year}$$

where

MAFER = the maximum allowable fugitive emission rate (0.004 lbs PM/hr.)

AOH = the actual operating hours**

CONV = conversion factor (1 ton/2000 lbs.)

** As long as the 12-month hours of operation limitation in term A.II. is met, compliance with this limitation is demonstrated.

- 2. The permittee shall conduct, or have conducted, emission testing for the baghouse in accordance with the following requirements:
 - a. The emission testing shall be conducted 6 months prior to Title V permit renewal.
 - b. The emissions testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulate.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

| <u>Pollutant</u> | <u>Test Method</u> | <u>Location</u> |
|------------------|--------------------|-----------------------------------|
| Particulate | Method 5 | 40 <u>CFR</u> Part 60, Appendix A |

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an “Intent to Test” notification to the appropriate Ohio EPA District Office or local air agency. The “Intent to Test” notification shall describe in detail the proposed test methods and procedures, the emissions unit(s) operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office’s or local air agency’s refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit(s) and the testing procedures provide a valid characterization of the emissions from the emissions unit(s) and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s).

3. Emission Limitation:

0% opacity, as a six- minute average, from the stack

Applicable Compliance Method:

Compliance shall be determined according to test Method 9 as set forth in “Appendix on Test Methods” in 40 CFR Part 60.

4. Emission Limitation:

0.004 lb PM/hr from the fugitive dust source.

Applicable Compliance Method:

Based upon a one time calculation supplied by the permittee.

5. Emission Limitation:

20% opacity, as a three-minute average, from the fugitive dust source

Applicable Compliance Method:

40 CFR Part 60, Method 9, with opacity readings taken from any exit of the building.

VI. Miscellaneous Requirements

None.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|--|--------------------------------------|--|
| Casting, Cooling, Degating, and Sorting Line #2 (existing) | | |

2. Additional Terms and Conditions

2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

None.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

None.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|--|---|
| Casting Shotblast System #2 (existing) | OAC rule 3745-31-05 (D) | 5.67 tons PM/yr., as a rolling 12-month summation from the stack. |
| | OAC rule 3745-17-07(A)(1) | Less stringent than OAC rule 3745-31-05 |
| | OAC rule 3745-17-11(B)(1) | Less stringent than OAC rule 3745-31-05 |
| | OAC rule 3745-31-05(A)(3) | 1.89 lbs. PM/hour from the stack. |
| | | 0.010 gr./dscf from the stack. |
| | | 0% opacity, as a six minute average, from the stack. |
| | | 0.57 ton PM/yr., as a rolling 12-month summation from the fugitive dust source. |
| | 0.19 lb. PM/hour from the fugitive dust source. | |
| | 20% opacity, as a three minute average, from the fugitive dust source. | |
| | The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), OAC rule 3745-17-11(B)(1), and OAC rule 3745-31-05(D). | |

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05 shall be demonstrated by the use of a baghouse(s) and compliance with the limits in term A.I.1.

II. Operational Restrictions

1. The maximum annual operating hours for this emissions unit shall not exceed 6,000 hours per year, based upon a rolling, 12- month summation of the operating hours.

This is an existing source and the applicant has historical data demonstrating compliance with the rolling 12-month summation of operating hours.

2. The pressure drop across the baghouse shall be maintained within the range of 1 to 15 inches of water while any emission unit controlled by the baghouse is in operation except for the first 45 days following a change of at least 50% of the fabric bags, when the pressure drop shall be maintained below 15 inches of water while any emission unit controlled by the baghouse is in operation.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. The operating hours for each month.
 - b. The rolling , 12-month summation of the operating hours.
2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse(s) while the emissions unit(s) is in operation. The monitoring equipment shall be installed, calibrated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse once each operating day.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month operating hours limitation excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.
2. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the emission unit was in operation and the pressure drop across the baghouse did not comply with the allowable range specified in the permit.
3. These reports, as denoted in terms A.IV.1. and 2., are due by the date described in Part 1- General Terms and Conditions of the permit under section (A) (1).

V. Testing Requirements

1. Compliance with the emission limitation(s) in section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation:

5.67 tons of PM per year, as a rolling 12-month summation from the stack.

Applicable Compliance Method:

Compliance with the 5.67tons of PM per rolling limitation shall be assumed as long as the 6,000 hours per rolling 12-month summation is met. This is based both on the recordkeeping requirements in term A.III. and the following calculation:

$$(\text{MASER})(\text{AOH})(\text{CONV}) = 5.67\text{tons of PM per year}$$

where

MASER = the maximum allowable stack emission rate (1.89 lbs. PM*/hr.)

AOH = the actual operating hours **

CONV = conversion factor (1 ton/2000 lbs.)

**As long as the 12-month hours of operation limitation in term A.II. is met, compliance with this limitation is demonstrated.

b. Emission Limitation:

0.57 ton of PM per year, as a rolling 12-month summation from the fugitive dust source.

Applicable Compliance Method:

Compliance with the 0.57 ton of PM per rolling limitation shall be assumed as long as the 6,000 hours per rolling 12-month summation is met. This is based both on the recordkeeping requirements in term A.III. and the following calculation:

$$(\text{MAFER})(\text{AOH})(\text{CONV}) = 0.57 \text{ ton of PM per year}$$

where

MAFER=the maximum allowable fugitive emission rate (0.19 lb PM/hr.)

AOH = the actual operating hours **

CONV = conversion factor (1 ton/2000 lbs.)

**As long as the 12-month hours of operation limitation in term A.II. is met, compliance with this limitation is demonstrated.

2. The permittee shall conduct, or have conducted, emission testing for the baghouse in accordance with the following requirements:

a. The emission testing shall be conducted 6 months prior to Title V permit renewal.

- b. The emissions testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulate.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

| <u>Pollutant</u> | <u>Test Method</u> | <u>Location</u> |
|------------------|--------------------|-----------------------------------|
| Particulate | Method 5 | 40 <u>CFR</u> Part 60, Appendix A |

- d. The test(s) shall be conducted while the emissions unit it operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an “Intent to Test” notification to the appropriate Ohio EPA District Office or local air agency. The “Intent to Test” notification shall describe in detail the proposed test methods and procedures, the emissions unit(s) operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office’s or local air agency’s refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit(s) and the testing procedures provide a valid characterization of the emissions from the emissions unit(s) and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s).

3. Emission Limitation:

0% opacity, as a six-minute average, from the stack

Applicable Compliance Method:

Compliance shall be determined according to test Method 9 as set forth in “Appendix on Test Methods” in 40 CFR Part 60.

4. Emission Limitation:

0.19 lb PM/hr from the fugitive dust source.

Applicable Compliance Method:

Based upon a one time calculation supplied by the permittee.

5. Emission Limitation:

20% opacity, as a three-minute average, from the fugitive dust source.

Applicable Compliance Method:

40 CFR Part 60, Method 9, with opacity readings taken from any exit of the building.

VI. Miscellaneous Requirements

None.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|--------------------------------------|--|
| Casting Shotblast System #2 (existing) | | |

2. Additional Terms and Conditions

- 2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

None.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

None.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|--|---|
| Mold Making Line #2 (existing) | OAC rule 3745-31-05(D) | 1.44 tons PM/yr., as a rolling, 12-month summation from the stack. |
| | OAC rule 3745-17-07(A)(1) | Less stringent than OAC rule 3745-31-05 |
| | OAC rule 3745-17-11(B)(1) | Less stringent than OAC rule 3745-31-05 |
| | OAC rule 3745-21-07 (G) | A parting spray using water-based or non photochemically reactive materials |
| | OAC rule 3745-31-05(A)(3) | 0.48 lb. PM/hour from the stack |
| | | 0.010 gr./dscf from the stack |
| | | 0% opacity, as a six minute average, from the stack. |
| | | 0.00147 ton PM/yr., as a rolling, 12-month summation from the fugitive dust source. |
| | | 0.00049 lbs. PM/hour from the fugitive dust source. |
| | | 20% opacity, as a three minute average, from the fugitive dust source |
| | 8.1 lbs. OC/hr. and 24.3 tons OC/yr.** | |
| | The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), OAC rule 3745-17-11(B)(1), OAC rule 3745-21-07(G), and | |

OAC rule 3745-31-05(D).

**The permitted allowable organic compound emission rate is based on all of the parting spray applied being emitted. If test results in the future indicate a lower emission rate, then Ohio EPA will modify this permit to incorporate the lower limit(s).

2. Additional Terms and Conditions

- 2.a** Compliance with OAC rule 3745-31-05 shall be demonstrated by the use of a baghouse(s) and compliance with the limits in term A.I.1.

II. Operational Restrictions

1. The maximum annual operating hours for this emissions unit shall not exceed 6,000 hours per year, based upon a rolling, 12- month summation of the operating hours.
2. The pressure drop across the baghouse shall be maintained within the range of 1 to 15 inches of water while any emission unit controlled by the baghouse is in operation except for the first 45 days following a change of at least 50% of the fabric bags, when the pressure drop shall be maintained below 15 inches of water while any emission unit controlled by the baghouse is in operation.
3. This is an existing source and the applicant has historical data demonstrating compliance with the rolling 12-month summation of operating hours.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. The operating hours for each month.
 - b. The rolling , 12-month summation of the operating hours.
2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse(s) while the emissions unit(s) is in operation. The monitoring equipment shall be installed, calibrated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse once each operating day.
 - a. The parting spray usage for each month.
 - b. The rolling 12-month summation of parting spray usage.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month operating hours limitations excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.
2. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the emission unit was in operation and the pressure drop across the baghouse did not comply with the allowable range specified in the permit.
3. These reports, as denoted in terms A.IV.1. and 2., are due by the date described in Part 1- General Terms and Conditions of the permit under section (A) (1).

V. Testing Requirements

1. Compliance with the emission limitation(s) in section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:

1.44 tons of PM per year, as a rolling 12-month summation from the stack.

Applicable Compliance Method:

Compliance with the 1.44 tons of PM per rolling limitation shall be assumed as long as the 6,000 hours per rolling 12-month summation is met. This is based both on the recordkeeping requirements in term A.III. and the following calculation:

$$(\text{MASER})(\text{AOH})(\text{CONV}) = 1.44 \text{ tons of PM per year}$$

where

MASER = the maximum allowable stack emission rate (0.48 lbs. PM*/hr.)

AOH = the actual operating hours**

CONV = conversion factor (1 ton/2000 lbs.)

**As long as the 12-month hours of operation limitation in term A.II. is met, compliance with this limitation is demonstrated.

- b. Emission Limitation:

0.00147 ton of PM per year, as a rolling 12-month summation from the fugitive dust source.

Applicable Compliance Method:

Compliance with the 0.00147 ton of PM per rolling limitation shall be assumed as long as the 6,000 hours per rolling 12-month summation is met. This is based both on the recordkeeping requirements in term A.III. and the following calculation:

$$(MAFER)(AOH)(CONV) = 0.00147 \text{ ton of PM per year}$$

where

MAFER = the maximum allowable fugitive emission rate (0.00049 lb. PM/hr.)

AOH = the actual operating hours**

CONV = conversion factor (1 ton/2000 lbs.)

**As long as the 12-month hours of operation limitation in term A.II. is met, compliance with this limitation is demonstrated.

- 2. Compliance with the emission limitation(s) in section B.I.1. of these terms and conditions shall be determined in accordance with the following method(s):

The permittee shall conduct, or have conducted, emission testing for the baghouse(s) in accordance with the following requirements:

- a. The emission testing shall be conducted 6 months prior to Title V permit renewal.
- b. The emissions testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulate.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

| <u>Pollutant</u> | <u>Test Method</u> | <u>Location</u> |
|------------------|--------------------|-----------------------------------|
| Particulate | Method 5 | 40 <u>CFR</u> Part 60, Appendix A |

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit(s) operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit(s) and the testing procedures provide a valid characterization of the emissions from the emissions unit(s) and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s).

3. Emission Limitation:

The OC emissions shall not exceed 8.1 pounds per hour.

Applicable Compliance Method:

Compliance shall be determined by using the following calculation:

$$(MXPH)(MANU) = 8.1 \text{ pounds of organic compounds per hour}$$

where

MXPH = the maximum parting spray utilized (2 gal/hr.)

MANU = the emission factor provided by the manufacturer (4.05 lbs. OC/gal.)

This is a one time calculation to determine compliance with the parting spray restriction listed above.

4. Emission Limitation:

The organic compound emissions shall not exceed 24.3 tons per year

Applicable Compliance Method:

Compliance shall be determined by using the following calculation:

$$(MXPH)(MANU)(AOH)(CONV) = 24.3 \text{ tons of organic compounds per year}$$

where

MXPH = the maximum parting spray utilized (2 gal/hr.)

MANU = the emission factor provided by the manufacturer (4.05 lbs OC/gal.)

AOH = the actual operating hours (6,000 hrs/yr)

CONV = conversion factor (1 ton/ 2,000 lbs.)

5. Emission Limitation:

0% opacity, as a six-minute average, from the stack

Applicable Compliance Method:

Compliance shall be determined according to test Method 9 as set forth in “Appendix on Test Methods” in 40 CFR Part 60.

6. Emission Limitation:

0.00049 lb. PM/hr. from the fugitive dust source

Applicable Compliance Method:

Based upon a one time calculation supplied by the permittee.

7. Emission Limitation:

20% opacity, as a three-minute average, from the fugitive dust source

Applicable Compliance Method:

40 CFR Part 60, Method 9, with opacity readings taken from any exit of the building

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|--|--|
| Mold Making Line #2 (existing) | | |

2. **Additional Terms and Conditions**

- 2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

None.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements - AIR TOXICS POLICY

The permit to install for this emissions unit (P058) was evaluated based on the actual materials (parting spray) specified by the permittee in the permit to install application. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and is (are)

based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model (or other Ohio EPA approved model) and compared the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Petroleum Distillate

TLV (ug/m3): 5,000

Maximum Hourly Emission Rate (lbs/hr): 8.10

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 64.15

MAGLC (ug/m3): 119.04

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the Air Toxic Policy is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the Air Toxic Policy will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the Air Toxic Policy will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

Record keeping requirements for emissions units that must comply with the Air Toxic Policy

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that a changed emissions unit will still satisfy the Air Toxic Policy:

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the Air Toxic Policy; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> | |
|--|--------------------------------------|--|---|
| Holding Furnace & Transit Ladle System #2 (existing) | OAC 3745-31-05(D) | 8.64 tons PM/yr., as a rolling 12-month summation from the stack. | |
| | OAC rule 3745-17-07(A)(1) | Less stringent than OAC rule 3745-31-05 | |
| | OAC rule 3745-17-11(B)(1) | Less stringent than OAC rule 3745-31-05 | |
| | OAC rule 3745-31-05(A)(3) | 2.88 lbs. PM/hour from the stack. | |
| | | | 0.010 gr./dscf from the stack. |
| | | | 0% opacity, as a six minute average, from the stack. |
| | | | 0.79 lb. PM/hr. from the fugitive dust source. |
| | | | 2.37 tons PM/yr., as a rolling 12-month summation from the fugitive dust source.. |
| | | 20% opacity, as a three minute average, from the fugitive dust source. | |
| | | The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), OAC rule 3745-17-11(B)(1), and OAC rule 3745-31-05(D). | |

Honda Of America Mfg Inc

PTI Application: **05-10137**

Date: July 18, 2000

Facility ID: **0575000174**

Emissions Unit ID: **P905**

2. Additional Terms and Conditions

- 2.a** Compliance with OAC rule 3745-31-05 shall be demonstrated by the use of hoods, fans, and other equipment to adequately enclose, contain, capture, vent and control fugitive PM dust by venting to a baghouse and compliance with the limits in term A.I.1.
- 2.b** Compliance with the emission limits from OAC rule 3745-17-07(B)(1) shall satisfy the BAT requirement of OAC rule 3745-31-05.

II. Operational Restrictions

- 1. The maximum annual operating hours for this emissions unit shall not exceed 6,000 hours per year, based upon a rolling, 12- month summation of the operating hours.

This is an existing source and the applicant has historical data demonstrating compliance with the rolling 12-month summation of operating hours.

- 2. The pressure drop across the baghouse shall be maintained within the range of 1 to 15 inches of water while any emission unit controlled by the baghouse is in operation except for the first 45 days following a change of at least 50% of the fabric bags, when the pressure drop shall be maintained below 15 inches of water while any emission unit controlled by the baghouse is in operation.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain monthly records of the following information:
 - a. The operating hours for each month.
 - b. The rolling , 12-month summation of the operating hours.
- 2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse(s) while the emissions unit(s) is in operation. The monitoring equipment shall be installed, calibrated, and maintained in accordance with the manufacture's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse once each operating day.

IV. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports which identify all exceedances, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, of the rolling 12-month operating hours limitation.
- 2. The Permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the emission unit was in operation and the pressure drop across the baghouse did not comply with the allowable range specified in the permit.

- 3. These reports, as denoted in terms A.IV.1. and 2., are due by the date described in Part 1 - General Terms and Conditions of the permit under section (A)(1).

V. Testing Requirements

- 1. Compliance with the emission limitation(s) in section A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:

8.64 tons of PM per year, as a rolling 12-month summation from the stack.

Applicable Compliance Method:

Compliance with the 8.64 tons of PM per rolling limitation shall be assumed as long as the 6,000 hours per rolling 12-month summation is met. This is based both on the recordkeeping requirements in term A.III. and the following calculation: Compliance shall be determined by using the following calculation:

$$(MASER)(AOH)(CONV) = 8.64 \text{ tons of PM per year}$$

where

MAER = the maximum allowable emission rate (2.88 lbs. PM*/hr.)

AOH = the actual operating hours **

CONV= conversion factor (1 ton/2000 lbs.)

** As long as the 12-month hours of operation limitation in term A.II. is met, compliance with this limitation is demonstrated.

- b. Emission Limitation:

2.37 tons of PM per year, as a rolling 12-month summation from the fugitive dust source.

Applicable Compliance Method:

Compliance with the 2.37 tons of PM per rolling limitation shall be assumed as long as the 6,000 hours per rolling 12-month summation is met. This is based both on the recordkeeping requirements in term A.III. and the following calculation:

$$(MAFER)(AOH)(CONV) = 2.37 \text{ tons of PM per year}$$

where

MAFER = the maximum allowable fugitive emission rate (0.79 lb. PM/hr.)

AOH = the actual operating hours **

CONV= conversion factor (1 ton/2000 lbs.)

** As long as the 12-month hours of operation limitation in term A.II. is met, compliance with this limitation is demonstrated.

2. The permittee shall conduct, or have conducted, emission testing for the baghouse(s) in accordance with the following requirements:

- a. The emission testing shall be conducted 6 months prior to Title V permit renewal.
- b. The emissions testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulate.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

| <u>Pollutant</u> | <u>Test Method</u> | <u>Location</u> |
|------------------|--------------------|-----------------------------------|
| Particulate | Method 5 | 40 <u>CFR</u> Part 60, Appendix A |

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit(s) operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit(s) and the testing procedures provide a valid characterization of the emissions from the emissions unit(s) and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s).

3. Emission Limitation

0% opacity, as a six-minute average, from the stack.

Honda Of America Mfg Inc

PTI Application: **05-10137**

Date: July 18, 2000

Facility ID: **0575000174**

Emissions Unit ID: **P905**

Applicable Compliance Method:

Compliance shall be determined according to test Method 9 as set forth in “Appendix on Test Methods” in 40 CFR Part 60.

4. Emission Limitation:

0.79 lb. PM/hr. from the fugitive dust source.

Applicable Compliance Method:

Based upon a one time calculation supplied by the permittee.

5. Emission Limitation:

20% opacity, as a three-minute average, from the fugitive dust source.

Applicable Compliance Method:

40 CFR Part 60, Method 9, with readings taken from any exit of the building.

VI. Miscellaneous Requirements

None.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|--|--|
| Holding Furnace & Transit Ladle System #2 | | |

2. Additional Terms and Conditions

2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

None.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

None.